

MICHELLE A. CHILDERS (SBN #197064)  
 michelle.childers@dbr.com  
 NATHAN D. CARDOZO (SBN #259097)  
 nathan.cardozo@dbr.com  
 DRINKER BIDDLE & REATH LLP  
 50 Fremont Street, 20th Floor  
 San Francisco, CA 94105-2235  
 Telephone: (415) 591-7500  
 Facsimile: (415) 591-7510

Attorneys for Defendants  
 ETHICON, INC. (on its own behalf and behalf of its  
 Division, ETHICON WOMEN'S HEALTH &  
 UROLOGY, and erroneously sued as GYNECARE,  
 INC.); and JOHNSON & JOHNSON

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

GINA LAFORGE, an individual,  
 Plaintiff,

v.

GYNECARE, INC., a California  
 corporation; ETHICON, INC., a New  
 Jersey corporation; JOHNSON &  
 JOHNSON, a New Jersey corporation; and  
 DOE MANUFACTURES ONE through  
 ONE HUNDRED,  
 Defendants.

Case No. 4:11-CV-00698-CW

**STIPULATION AND JOINT REQUEST  
 FOR RELIEF FROM CASE  
 MANAGEMENT SCHEDULE AND  
 ORDER**

Date: May 24, 2011  
 Time: 2:00 p.m.  
 Courtroom: 2  
 Judge: Hon. Claudia Wilken

Complaint Filed: October 20, 2010  
**Trial Date:** Not set

Pursuant to Local Rule 16-2(e) of the United States District Court of the Northern District  
 of California, the parties request a continuance of the Case Management Conference as follows:

1. On February 15, 2011, the Court scheduled a Case Management Conference for  
 May 24, 2011.
2. Due to scheduling conflicts, all parties have agreed to request that the Case  
 Management Conference be continued for 60 days. The parties further request that they be

1 excused from the requirement (Local Rule 16-10(a)) that lead trial counsel attend the Case  
2 Management Conference.

3 WHEREFORE Plaintiffs and Defendants, hereby stipulate by the undersigned counsel to  
4 request that the Court continue the Case Management Conference currently set for May 24, 2011  
5 for an additional 60 days or to a date convenient to the Court and that lead trial counsel be  
6 excused from their obligation to attend that Case Management Conference.

7 Dated: May 6, 2011

DRINKER BIDDLE & REATH LLP

8  
9 By: /s/ Nathan D. Cardozo

10 Nathan D. Cardozo

11 Attorneys for Defendants  
12 ETHICON, INC. (on its own behalf and behalf  
13 of its Division, ETHICON WOMEN'S  
14 HEALTH & UROLOGY, and erroneously  
sued as GYNECARE, INC.); and JOHNSON  
& JOHNSON

15 Dated: May 6, 2011

GIRARDI & KEESE

16  
17 By: /s/ Amanda Kent

18 Amanda Kent  
19 Thomas V. Girardi  
20 Amy Fisch Solomon  
Amanda Kent


Attorneys for Plaintiffs

21 The Case Management Conference scheduled for May 24, 2011 is hereby continued until  
22 July 26, 2011. Lead trial counsel must attend, unless excused upon a showing of good cause.

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 Dated: 5/6/2011

BY THE COURT

25  
26 By:   
27 Honorable Claudia Wilken  
28 United States District Judge